

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

SCANSOFT, INC.'S ASSENTED TO MOTION FOR IMPOUNDMENT

ScanSoft, Inc. (“ScanSoft”) moves, pursuant to Local Rule 7.2 and paragraph 14 of the parties’ agreed upon Protective Order, for an order impounding ScanSoft, Inc.’s Opposition to Defendant’s Motion for Protective Order Compelling Identification of Trade Secrets (“the Opposition”), filed concurrently by hand.

As grounds for this motion, ScanSoft states that the Opposition discloses highly sensitive and proprietary ScanSoft trade secret information contained in ScanSoft's Answers to the Second Set of Interrogatories (Nos. 1-4) of Voice Signal Technologies, Inc., designated by ScanSoft as "Highly Confidential." A copy of ScanSoft's Answers to the Second Set of Interrogatories (Nos. 1-4) of Voice Signal Technologies, Inc. is also attached as an exhibit to the Opposition.

Pursuant to paragraph 14 of the parties' Protective Order, which was filed with the Court on June 18, 2004, but has not yet been entered, any documents filed with the Court that disclose materials designated as "Highly Confidential" must be filed under seal.

WHEREFORE, ScanSoft requests that the Court enter an order impounding ScanSoft's Opposition. ScanSoft further requests that the Court grant it leave, pursuant to Local Rule 7.2(d), to file the Opposition under seal concurrently with this motion for impoundment.

Dated: March 15, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Jack C. Schecter

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CERTIFICATE PURUSANT TO LOCAL RULE 7.1

I certify that counsel for ScanSoft conferred with counsel for VST on March 15, 2005 in an effort to resolve the issues presented in this motion and that counsel for VST assented to this motion.

/s/ Jack C. Schecter